

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

CHINA SCOTT

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:  
:  
:

CRIMINAL NO. 1:16-CR-79

(Judge Rambo)

INDICTMENT

THE GRAND JURY CHARGES THAT:

Background

**FILED**  
HARRISBURG, PA

MAR 30 2016

MARIA E. ELKINS, CLERK  
Per VE

- (1) Medicaid is a federal “health care benefit program” as defined in 18 U.S.C. § 24(b) that provides medical assistance for certain individuals and families with low income and financial resources.
- (2) In 2005, the defendant, CHINA SCOTT, had been convicted of health care fraud, in violation of 18 U.S.C. § 1035(a)(2).
- (3) As a result of this conviction, the defendant, CHINA SCOTT, was, and is, an “excluded person”, meaning that no payment could be made by any federal health care benefit program for services provided by her.
- (4) In September 2015, the defendant, CHINA SCOTT, pleaded guilty to false statements relating to health care matters, in violation of 18 U.S.C. § 1035(a)(2).

- (5) In connection with the 2015 offense, the defendant, CHINA SCOTT, was released subject to the supervision of the pre-trial supervision officer. Her conditions of release included that she was prohibited from seeking employment in the health care field.

**THE SCHEME AND ARTIFICE TO DEFRAUD**

- (6) It was part of the scheme and artifice to defraud that the defendant, CHINA SCOTT, sought and obtained employment from Cool Waters, a home health care agency located in Dauphin County, Pennsylvania, and fraudulently failed to notify the agency that she is an excluded person.
- (7) It was further part of the scheme and artifice to defraud that the defendant, CHINA SCOTT, failed to notify her pre-trial supervision officer that she had obtained employment as a home health care provider. This was in violation of the conditions of her pre-trial release both because she was prohibited from obtaining employment in the health care field and because she was required to notify her pre-trial supervision officer of changes in employment.

## OVERT ACTS

- (8) In order to carry out this scheme and artifice to defraud, the defendant, CHINA SCOTT, aided and abetted by individuals known and unknown to the Grand Jury did, among other things, provide home health care services on numerous occasions to a disabled individual, L.H., in L.H.'s home in Lancaster County. These occasions included November 11, 12, 16, 18, 20, 23, 25, and 27, 2015; December 2, 4, 5, 7-12, 14-19, 23-26, and 28-31, 2015; and January 1, 2, 4, and 5, 2016.

Beginning in approximately November 2015, and continuing through on or about January 5, 2016, in Dauphin County and Lancaster County, Pennsylvania, within the Middle District of Pennsylvania and elsewhere, the defendant, CHINA SCOTT, and individuals known and unknown to the Grand Jury, aided and abetted by each other, knowingly and willfully executed and attempted to execute the above-described scheme and artifice to defraud and obtain, by means of materially false and fraudulent pretenses and representations, money and property owned by and under the custody of Medicaid and other health care providers, health care benefit programs as defined in Title

18, United States Code, Section 24(b), in connection with the delivery of and payment for health care benefits, items, and services.

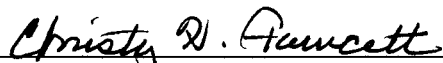
In violation of Title 18, United States Code, Section 1347 and Section 2.

A TRUE BILL



Grand Jury Foreperson

PETER J. SMITH  
United States Attorney

  
CHRISTY H. FAWCETT  
Assistant U.S. Attorney

Dated: 3-30-2016